

Exhibit “A”

Devon Bergman

From: jreitzas bnrlp.com
Sent: Monday, January 6, 2025 8:32 PM
To: Devon Bergman
Subject: FW: Cajilema v. Barrett - NY DOL audit and potential settlement

Joshua T. Reitzas
Partner



125 Park Avenue | 25th Floor | New York, New York 10017
Office: 212-804-6329 ext. 504 | Cell: 917-902-6582
Facsimile: 646-461-2312
Email: jreitzas@bnrlp.com | www.bnrlp.com

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From: jreitzas bnrlp.com
Sent: Friday, December 27, 2024 9:37 PM
To: Jeff Maguire <jmaguire@stevensonmarino.com>
Cc: William Kennedy <WKennedy@mmwr.com>; trosenberg bnrlp.com <trosenberg@bnrlp.com>; Gabriella Petrillo <GPetrillo@mmwr.com>; Justin Marino <jmarino@stevensonmarino.com>; William Kennedy <WKennedy@mmwr.com>; Gabriella Petrillo <GPetrillo@mmwr.com>
Subject: Re: Cajilema v. Barrett - NY DOL audit and potential settlement

Jeff:

You need to stop. We are literally bringing it to your attention and asked for a call.

Your constant threats of sanctions is literally a problem. We want to constructively resolve issues. We are in total agreement that the statement below is not accurate. And we are happy to go over everything. But acting like someone is trying to put one over on anyone has to stop right now.

Joshua T. Reitzas, Partner
BERLANDI NUSSBAUM & REITZAS LLP
125 Park Avenue, 25th Floor
New York, New York 10017
(O) 212-804-6329
(C) 917-902-6582
jreitzas@bnrlp.com
www.bnrlp.com

Sent from my iPhone

On Dec 27, 2024, at 6:18 PM, Jeff Maguire <jmaguire@stevensonmarino.com> wrote:

Bill,

I was not aware of any NY DOL investigation, because your clients' responses failed to disclose this information. See below. If you are not representing your clients in this investigation, who is? We will need to write to the judge to apprise the court of your clients' conduct. In the interim, please immediately provide me with the name and number of the DOL investigator.

REQUEST NO. 35: Produce documents consisting, containing or evidencing investigations, rulings, decisions or opinions rendered by any federal or state court or administrative agency, relating to the issue of whether Plaintiff was paid in compliance with federal and state laws. This request includes, but is not limited to, opinion letters (including opinions and advice from legal counsel) sought by Defendants concerning the compensation to Plaintiff for the Relevant Period.

OBJECTION: Objection. Defendants object to the extent this request seeks information protected from disclosure by the attorney-client or other privilege, the work product doctrine and/or the protection afforded mental impressions, conclusions, opinions or legal theories of one or more attorneys and/or representatives of Defendants.

RESPONSE: Subject to and without waiving the foregoing general and specific objections, Defendants are not aware of any responsive documents. Defendants reserve the right to amend, modify, clarify and/or supplement its responses and objections as appropriate.

Best Regards,

Jeff Maguire

Tel: (212) 939-7229

jmaguire@stevensonmarino.com

<image001.png>

From: Kennedy, William <WKennedy@mmwr.com>

Sent: Friday, December 27, 2024 2:44 PM

To: Jeff Maguire <jmaguire@stevensonmarino.com>

Cc: jreitzas [bnrllp.com](mailto:jreitzas@bnrllp.com) <jreitzas@bnrllp.com>; trosenberg bnrllp.com <trosenberg@bnrllp.com>;

Petrillo, Gabriella <GPetrillo@mmwr.com>; Kennedy, William <WKennedy@mmwr.com>

Subject: Cajilema v. Barrett - NY DOL audit and potential settlement

External Email:

Jeff,

I believe you are aware of the NY DOL's audit of Barrett Roofs. I recently learned of it and that it is being resolved. The resolution may include a payment to your client, Mr. Cajilema.

I have not been involved in the audit or resolution of it. I understand that the audit focused on public sector jobs in NY state in 2018 and 2019 and that Barrett is currently waiting for a stipulation from the

NYDOL to resolve the matter. I will let you know as I receive more information, but let us know if you have time for a call on Monday or Tuesday to discuss this matter.

Thanks,
Bill

William Kennedy | Partner
Montgomery McCracken Walker & Rhoads LLP
Tel: 215-772-7291 | Fax: 215-731-3689 | wkennedy@mmwr.com | [Attorney Profile](#)
<image002.png>

William Kennedy | Partner
<image003.png> **Montgomery McCracken Walker & Rhoads LLP**
1735 Market Street | Philadelphia, PA 19103-7505
Tel: 215-772-7291 | Cell: 215-990-2321 | Fax: 215-731-3689 | wkennedy@mmwr.com | [Attorney Profile](#)
<image002.png>

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Devon Bergman

From: jreitzas bnrlp.com
Sent: Monday, January 6, 2025 8:30 PM
To: Devon Bergman
Subject: FW: Cajilema v. Barrett Roofs, Inc. - Plaintiff's Initial Disclosures and Discovery Requests

Joshua T. Reitzas
Partner



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From: jreitzas bnrlp.com
Sent: Monday, December 23, 2024 11:51 PM
To: Jeff Maguire <jmaguire@stevensonmarino.com>; trosenberg bnrlp.com <trosenberg@bnrlp.com>; Kennedy, William <WKennedy@mmwr.com>; Petrillo, Gabriella <GPetrillo@mmwr.com>
Subject: RE: Cajilema v. Barrett Roofs, Inc. - Plaintiff's Initial Disclosures and Discovery Requests

As I mentioned last week, we have been dealing with some issues. I did not elect to get on the phone whatsoever. You scheduled a call that we could not make. Please advise when you are available to discuss. This is really astonishing that you think this is acceptable behavior on your part. We are literally trying to work with you.

Joshua T. Reitzas
Partner



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From: Jeff Maguire <jmaguire@stevensonmarino.com>

Sent: Monday, December 23, 2024 11:30 PM

To: jreitzas bnrlp.com <jreitzas@bnrlp.com>; trosenberg bnrlp.com <trosenberg@bnrlp.com>; Kennedy, William <WKennedy@mmwr.com>; Petrillo, Gabriella <GPetrillo@mmwr.com>

Subject: RE: Cajilema v. Barrett Roofs, Inc. - Plaintiff's Initial Disclosures and Discovery Requests

You elected not to participate. Not only did you completely fail to respond to the multiple emails, but Bill tried to reach you and ultimately could not. Moreover, you chose to submit a joint response to my separate discovery requests.

Best,

Jeff Maguire
Stevenson Marino LLP
(212) 939-7229

----- Original message -----

From: "jreitzas bnrlp.com" <jreitzas@bnrlp.com>

Date: 12/23/24 11:19 PM (GMT-05:00)

To: Jeff Maguire <jmaguire@stevensonmarino.com>, "trosenberg bnrlp.com" <trosenberg@bnrlp.com>, "Kennedy, William" <WKennedy@mmwr.com>, "Petrillo, Gabriella" <GPetrillo@mmwr.com>

Subject: RE: Cajilema v. Barrett Roofs, Inc. - Plaintiff's Initial Disclosures and Discovery Requests

External Email:

I was not on the call. You met with Tom Delancey's attorneys. Not Barrett Roofs.

Joshua T. Reitzas
Partner



125 Park Avenue | 25th Floor | New York, New York 10017
Office: 212-804-6329 ext. 504 | Cell: 917-902-6582
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Devon Bergman

From: jreitzas bnrlp.com
Sent: Monday, January 6, 2025 8:29 PM
To: Devon Bergman
Subject: FW: Cajilema v. Barrett Roofs, Inc. - Plaintiff's Initial Disclosures and Discovery Requests

Joshua T. Reitzas
Partner



125 Park Avenue | 25th Floor | New York, New York 10017
Office: 212-804-6329 ext. 504 | Cell: 917-902-6582
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From: jreitzas bnrlp.com
Sent: Monday, December 23, 2024 11:19 PM
To: Jeff Maguire <jmaguire@stevensonmarino.com>; trosenberg bnrlp.com <trosenberg@bnrlp.com>; Kennedy, William <WKennedy@mmwr.com>; Petrillo, Gabriella <GPetrillo@mmwr.com>
Subject: RE: Cajilema v. Barrett Roofs, Inc. - Plaintiff's Initial Disclosures and Discovery Requests

I was not on the call. You met with Tom Delancey's attorneys. Not Barrett Roofs.

Joshua T. Reitzas
Partner



125 Park Avenue | 25th Floor | New York, New York 10017
Office: 212-804-6329 ext. 504 | Cell: 917-902-6582
Facsimile: 646-461-2312
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From: Jeff Maguire <jmaguire@stevensonmarino.com>
Sent: Monday, December 23, 2024 11:17 PM
To: jreitzas bnrllp.com <jreitzas@bnrllp.com>; trosenberg bnrllp.com <trosenberg@bnrllp.com>; Kennedy, William <WKennedy@mmwr.com>; Petrillo, Gabriella <GPetrillo@mmwr.com>
Subject: RE: Cajilema v. Barrett Roofs, Inc. - Plaintiff's Initial Disclosures and Discovery Requests

We held a meet and confer that exceeded an hour.

Best,

Jeff Maguire
Stevenson Marino LLP
(212) 939-7229

----- Original message -----

From: "jreitzas bnrllp.com" <jreitzas@bnrllp.com>
Date: 12/23/24 11:12 PM (GMT-05:00)
To: Jeff Maguire <jmaguire@stevensonmarino.com>, "trosenberg bnrllp.com" <trosenberg@bnrllp.com>, "Kennedy, William" <WKennedy@mmwr.com>, "Petrillo, Gabriella" <GPetrillo@mmwr.com>
Subject: RE: Cajilema v. Barrett Roofs, Inc. - Plaintiff's Initial Disclosures and Discovery Requests

External Email:
Dear Jeff:

This is not a proper meet and confer. Please advise when are available. We advised that we would be providing you information. You are unilaterally advising you will not engage. This is absolutely not proper.

Joshua T. Reitzas
Partner



125 Park Avenue | 25th Floor | New York, New York 10017
Office: 212-804-6329 ext. 504 | Cell: 917-902-6582
Facsimile: 646-461-2312
Email: jreitzas@bnrllp.com | www.bnrllp.com

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From: Jeff Maguire <jmaguire@stevensonmarino.com>

Sent: Monday, December 23, 2024 7:59 PM

To: trosenberg bnrllp.com <trosenberg@bnrllp.com>; Kennedy, William <WKennedy@mmwr.com>; Petrillo, Gabriella <GPetrillo@mmwr.com>; jreitzas bnrllp.com <jreitzas@bnrllp.com>

Subject: RE: Cajilema v. Barrett Roofs, Inc. - Plaintiff's Initial Disclosures and Discovery Requests

Talia,

I am always amenable to a protective order/confidentiality stipulation to get so-ordered by the court. I believe the court gave us a deadline to do this in the original CMP but we did not. Two issues though, the documents identified in my deficiency letter are public documents not entitled to confidentiality. A company's ownership and a contract of sale do not contain sensitive information so it would not be deserving of a "confidential" designation. The information in your possession would be the same information filed with the state. The second issue is that I do not agree to "attorneys eyes only" designations. Everything in my possession I reserve the right to share with my client. Furthermore, I intend to use this information when I seek leave to amend the complaint to add defendants.

Please either provide the documents by close of business Friday or we will need to seek court intervention as originally discussed.

Best,

Jeff Maguire
Stevenson Marino LLP
(212) 939-7229

----- Original message -----

From: "trosenberg bnrllp.com" <trosenberg@bnrllp.com>

Date: 12/23/24 7:20 PM (GMT-05:00)

To: Jeff Maguire <jmaguire@stevensonmarino.com>, "Kennedy, William" <WKennedy@mmwr.com>, "Petrillo, Gabriella" <GPetrillo@mmwr.com>, "jreitzas bnrllp.com" <jreitzas@bnrllp.com>

Subject: RE: Cajilema v. Barrett Roofs, Inc. - Plaintiff's Initial Disclosures and Discovery Requests

External Email:

Good evening Jeff,

I just wanted to follow-up to ensure you received the below and to get your response on the item of the attorneys' eyes only review so we can ensure we are on track to get you what you need.

Yours,
Talia

Talia L. Rosenberg
Associate Attorney



125 Park Avenue | 25th Floor | New York, NY 10017
445 Hamilton Avenue | 14th Floor | White Plains, NY 10601
527 Route 22 | Suite 2 | Pawling, NY 12564
Office: 212-804-6329 ext. 527 | Cell: 6469396552
Email: trosenberg@bnrllp.com | www.bnrllp.com

From: trosenberg [bnrllp.com](mailto:trosenberg@bnrllp.com)

Sent: Monday, December 23, 2024 2:58 PM

To: Jeff Maguire <jmaguire@stevensonmarino.com>; Kennedy, William <WKennedy@mmwr.com>; Petrillo, Gabriella <GPetrillo@mmwr.com>; jreitzas [bnrllp.com](mailto:jreitzas@bnrllp.com) <jreitzas@bnrllp.com>

Subject: RE: Cajilema v. Barrett Roofs, Inc. - Plaintiff's Initial Disclosures and Discovery Requests

Good afternoon Jeff,

Please allow me to chime in here on the production of Barrett Roof ownership documents. We have no objection to producing these documents and we have a call into our client to discuss said production and ensure everyone is on the same page. Please note that there is no motion to file in the meantime as we intend to work with you to coordinate this exchange but just may need a little extra time to get it finalized. Our intention is to produce these documents for attorneys' eyes only, which we presume will not be an issue for you in the context in which you are requesting them (to be clear, we would not put any restrictions on the manner in which you could use the information from the documents but simply request that the confidential documents themselves would be for attorneys' eyes only). Please kindly confirm.

We appreciate your patience with this – between the time of year, some unexpected matters that have required Josh to travel to California this week, and the fact that I am preparing to go on maternity leave very soon – we have been a little bogged down. But we are making every effort to get this to you and just request your patience as we finalize.

Yours,
Talia

Talia L. Rosenberg
Associate Attorney



125 Park Avenue | 25th Floor | New York, NY 10017
445 Hamilton Avenue | 14th Floor | White Plains, NY 10601
527 Route 22 | Suite 2 | Pawling, NY 12564
Office: 212-804-6329 ext. 527 | Cell: 6469396552
Email: trosenberg@bnrllp.com | www.bnrllp.com

From: Jeff Maguire <jmaguire@stevensonmarino.com>

Sent: Sunday, December 22, 2024 2:00 PM

To: Kennedy, William <WKennedy@mmwr.com>; Petrillo, Gabriella <GPetrillo@mmwr.com>; jreitzas [bnrllp.com](mailto:jreitzas@bnrllp.com) <jreitzas@bnrllp.com>

Cc: trosenberg [bnrllp.com](mailto:trosenberg@bnrllp.com) <trosenberg@bnrllp.com>

Subject: RE: Cajilema v. Barrett Roofs, Inc. - Plaintiff's Initial Disclosures and Discovery Requests

Bill,

I never said I would summarize the documents I am entitled to, as that was both the subject of my deficiency letter and our meet and confer. Please either provide tomorrow or a time you are available to contact the court. Failure to do so will result in me making a motion to the court for a conference.

The transcript is both a public record and obviously already in your client's possession.

Best,

Jeff Maguire
Stevenson Marino LLP
(212) 939-7229

----- Original message -----

From: "Kennedy, William" <WKennedy@mmwr.com>
Date: 12/22/24 1:30 PM (GMT-05:00)
To: Jeff Maguire <jmaguire@stevensonmarino.com>, "Petrillo, Gabriella" <GPetrillo@mmwr.com>, "jreitzas bnrlp.com" <jreitzas@bnrlp.com>
Cc: "trosenberg bnrlp.com" <trosenberg@bnrlp.com>, "Kennedy, William" <WKennedy@mmwr.com>
Subject: RE: Cajilema v. Barrett Roofs, Inc. - Plaintiff's Initial Disclosures and Discovery Requests

External Email:

Jeff,

We'll be in touch tomorrow with an update. On our call, you said you would send a summary of the responses (and related documents) you believe you are entitled to but have not received. You were also going to send us the transcript you referred to, which we believe was in the *Rogers* case. Please send what you can.

Thanks,
Bill



William Kennedy | Partner
Montgomery McCracken Walker & Rhoads LLP
1735 Market Street | Philadelphia, PA 19103-7505
Tel: 215-772-7291 | Mobile: 215-990-2321 | Fax: 215-731-3689 | wkennedy@mmwr.com | [Attorney Profile](#)

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From: Jeff Maguire <jmaguire@stevensonmarino.com>

Sent: Friday, December 20, 2024 5:27 PM

To: Petrillo, Gabriella <GPetrillo@mmwr.com>; Kennedy, William <WKennedy@mmwr.com>; jreitzas bnrllp.com <jreitzas@bnrllp.com>

Cc: trosenberg bnrllp.com <trosenberg@bnrllp.com>

Subject: RE: Cajilema v. Barrett Roofs, Inc. - Plaintiff's Initial Disclosures and Discovery Requests

****CAUTION** External Email**

Gabriella/Bill,

During our meet and confer, I provided you until today to provide the deficient documents that we discussed. Specifically, Defendants have failed to provide any documents concerning ownership of the company and the transfer of the sale that occurred in July 2022. By close of business Monday, Defendants must either provide the documents or provide me with a time so that we can schedule a conference with the court pursuant to the Court's Individual Rules. Otherwise, I will write to the Court to state that Defendants have refused to cooperate accordingly and request a conference.

Best Regards,

Jeff Maguire

Tel: (212) 939-7229

jmaguire@stevensonmarino.com

STEVENSON
MARINOLLP

From: Petrillo, Gabriella <GPetrillo@mmwr.com>

Sent: Friday, December 20, 2024 4:32 PM

To: Kennedy, William <WKennedy@mmwr.com>; Jeff Maguire <jmaguire@stevensonmarino.com>; jreitzas bnrllp.com <jreitzas@bnrllp.com>

Cc: trosenberg bnrllp.com <trosenberg@bnrllp.com>

Subject: RE: Cajilema v. Barrett Roofs, Inc. - Plaintiff's Initial Disclosures and Discovery Requests

External Email:

Hi Jeff,

I am writing to confirm you were able to access the Barrett interrogatories yesterday. I've attached them again herein just to be sure.

Additionally, if you wouldn't mind forwarding the Rogers v. Westchester transcript that we spoke about on the phone, we would greatly appreciate it.

Thanks so much!
Gabriella



Gabriella Petrillo | Associate
Montgomery McCracken Walker & Rhoads LLP
437 Madison Avenue | New York, NY 10022
Tel: 212-551-7745 | Fax: 212-599-5085 | gpetrillo@mmwr.com | [Attorney Profile](#)



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From: Kennedy, William <WKennedy@mmwr.com>
Sent: Thursday, December 19, 2024 12:07 PM
To: Jeff Maguire <jmaguire@stevensonmarino.com>; jreitzas bnrllp.com <jreitzas@bnrllp.com>
Cc: trosenberg bnrllp.com <trosenberg@bnrllp.com>; Petrillo, Gabriella <GPetrillo@mmwr.com>; Kennedy, William <WKennedy@mmwr.com>
Subject: RE: Cajilema v. Barrett Roofs, Inc. - Plaintiff's Initial Disclosures and Discovery Requests

Jeff and Josh,

Our email on 10/31 included both defendants' responses to interrogatories. See attached.

Bill



William Kennedy | Partner
Montgomery McCracken Walker & Rhoads LLP
1735 Market Street | Philadelphia, PA 19103-7505
Tel: 215-772-7291 | Mobile: 215-990-2321 | Fax: 215-731-3689 | wkennedy@mmwr.com | [Attorney Profile](#)

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William Kennedy | Partner
Montgomery McCracken Walker & Rhoads LLP
Tel: 215-772-7291 | Fax: 215-731-3689 | wkennedy@mmwr.com | [Attorney Profile](#)



From: Jeff Maguire <jmaguire@stevensonmarino.com>
Sent: Thursday, December 19, 2024 11:11 AM
To: jreitzas bnrllp.com <jreitzas@bnrllp.com>; Kennedy, William <WKennedy@mmwr.com>

Cc: trosenberg bnrlp.com <trosenberg@bnrlp.com>; Petrillo, Gabriella <GPetrillo@mmwr.com>

Subject: RE: Cajilema v. Barrett Roofs, Inc. - Plaintiff's Initial Disclosures and Discovery Requests

****CAUTION** External Email**

Josh/Talia,

I had a meet and confer yesterday with Bill and Gabriella. I understand that the responses to the requests for production of documents was intended to be joint, but the interrogatory responses from Delancey are Delancey's responses only. The Barrett Roofs' interrogatory responses are still outstanding. I served back on September 10, 2024. Please promptly inform me as to when I will receive them.

Best Regards,

Jeff Maguire

Tel: (212) 939-7229

jmaguire@stevensonmarino.com

STEVENSON
MARINOLLP

From: Jeff Maguire

Sent: Tuesday, November 12, 2024 11:39 AM

To: 'jreitzas bnrlp.com' <jreitzas@bnrlp.com>; Kennedy, William <WKennedy@mmwr.com>

Cc: trosenberg bnrlp.com <trosenberg@bnrlp.com>; Petrillo, Gabriella <GPetrillo@mmwr.com>

Subject: RE: Cajilema v. Barrett Roofs, Inc. - Plaintiff's Initial Disclosures and Discovery Requests

Defendants' discovery responses are delinquent 12 days. Please provide by the end of the week to avoid court intervention.

Best Regards,

Jeff Maguire

Tel: (212) 939-7229

jmaguire@stevensonmarino.com

STEVENSON
MARINOLLP

From: jreitzas bnrlp.com <jreitzas@bnrlp.com>

Sent: Wednesday, October 9, 2024 11:56 AM

To: Jeff Maguire <jmaguire@stevensonmarino.com>; Kennedy, William <WKennedy@mmwr.com>

Cc: trosenberg bnrlp.com <trosenberg@bnrlp.com>; Petrillo, Gabriella <GPetrillo@mmwr.com>

Subject: RE: Cajilema v. Barrett Roofs, Inc. - Plaintiff's Initial Disclosures and Discovery Requests

External Email:

Jeff,

Am I missing something? Bill, are we not reciprocating the courtesy? This is bizarre.

We are trying to get the discovery in order and produce it. We need a courtesy. We will give you one if you need it. What am I missing here?

To be clear, you crossed a line when you accused us, Jeff. And I am still thinking about what you did. I am not pleased.

Joshua T. Reitzas

Partner



125 Park Avenue | 25th Floor | New York, New York 10017

Office: 212-804-6329 ext. 504 | Cell: 917-902-6582

Facsimile: 646-461-2312

Email: jreitzas@bnrllp.com | www.bnrllp.com

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From: Jeff Maguire <jmaguire@stevensonmarino.com>

Sent: Wednesday, October 9, 2024 11:51 AM

To: Kennedy, William <WKennedy@mmwr.com>; jreitzas bnrllp.com <jreitzas@bnrllp.com>

Cc: trosenberg bnrllp.com <trosenberg@bnrllp.com>; Petrillo, Gabriella <GPetrillo@mmwr.com>

Subject: RE: Cajilema v. Barrett Roofs, Inc. - Plaintiff's Initial Disclosures and Discovery Requests

I'll just respond to both of you in this email. Your clients obviously lost any argument for professional courtesies due to their conduct. It was not me that deemed their conduct improper, it was the judge. Improper to a sanctionable level (which bad faith is the standard).

But if you need more time, then your clients can agree now to the additional time for Plaintiff that Defendants are being provided, should your clients ever serve their requests. We either have an agreement on the mutual extension or we do not.

Best Regards,

Jeff Maguire

Tel: (212) 939-7229

jmaguire@stevensonmarino.com



From: Kennedy, William <WKennedy@mmwr.com>

Sent: Wednesday, October 9, 2024 11:35 AM

To: jreitzas [bnrlp.com](mailto:jreitzas@bnrlp.com) <jreitzas@bnrlp.com>; Jeff Maguire <jmaguire@stevensonmarino.com>

Cc: trosenberg [bnrlp.com](mailto:trosenberg@bnrlp.com) <trosenberg@bnrlp.com>; Petrillo, Gabriella <GPetrillo@mmwr.com>; Kennedy, William <WKennedy@mmwr.com>

Subject: RE: Cajilema v. Barrett Roofs, Inc. - Plaintiff's Initial Disclosures and Discovery Requests

External Email:

If I can jump in, we appreciate the consideration. The briefing schedule took time we would have used to gather documents and draft objections and responses. We are still working on getting and reviewing documents. We requested until 10/31 to be cautious, but it's possible that we will serve objections/responses and documents before then.

I don't expect to have an issue with any reasonable request for additional time. One or both defendants will likely serve interrogatories and document requests in the next week. I suggest that you review them and let us know if you'll need an extension of time to respond. I don't foresee any issue with an extension of 22 days (or more or less time).

Happy to discuss the discovery deadlines or anything else.

Bill



William Kennedy | Partner

Montgomery McCracken Walker & Rhoads LLP

1735 Market Street | Philadelphia, PA 19103-7505

Tel: 215-772-7291 | Mobile: 215-990-2321 | Fax: 215-731-3689 | wkennedy@mmwr.com | [Attorney Profile](#)

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From: jreitzas [bnrlp.com](mailto:jreitzas@bnrlp.com) <jreitzas@bnrlp.com>

Sent: Wednesday, October 9, 2024 11:27 AM

To: Jeff Maguire <jmaguire@stevensonmarino.com>

Cc: Kennedy, William <WKennedy@mmwr.com>; trosenberg [bnrlp.com](mailto:trosenberg@bnrlp.com) <trosenberg@bnrlp.com>; Petrillo, Gabriella <GPetrillo@mmwr.com>

Subject: RE: Cajilema v. Barrett Roofs, Inc. - Plaintiff's Initial Disclosures and Discovery Requests

*****CAUTION*** External Email**

Of course there is reciprocity. But you may want to review the professional rules on this topic. Also, you throw around the word improper – you are literally about to cross a line. Do not try to deflect Jeff. I am not that guy.

Joshua T. Reitzas
Partner



125 Park Avenue | 25th Floor | New York, New York 10017
Office: 212-804-6329 ext. 504 | Cell: 917-902-6582
Facsimile: 646-461-2312
Email: jreitzas@bnrllp.com | www.bnrllp.com

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From: Jeff Maguire <jmaguire@stevensonmarino.com>
Sent: Wednesday, October 9, 2024 11:25 AM
To: jreitzas bnrllp.com <jreitzas@bnrllp.com>
Cc: William Kennedy <WKennedy@mmwr.com>; trosenberg bnrllp.com <trosenberg@bnrllp.com>; Gabriella Petrillo <GPetrillo@mmwr.com>
Subject: RE: Cajilema v. Barrett Roofs, Inc. - Plaintiff's Initial Disclosures and Discovery Requests

I have absolutely no obligation to accommodate. This is especially the case when my prior courtesies have resulted in your clients taking improper actions in the case. I have not even been proved a reason for the need for the extension.

If there is no agreement to reciprocity, I do not consent to the extension.

Best Regards,

Jeff Maguire

Tel: (212) 939-7229
jmaguire@stevensonmarino.com

STEVENSON
MARINOLLP

From: jreitzas bnrllp.com <jreitzas@bnrllp.com>
Sent: Wednesday, October 9, 2024 11:18 AM
To: Jeff Maguire <jmaguire@stevensonmarino.com>
Cc: William Kennedy <WKennedy@mmwr.com>; trosenberg bnrllp.com <trosenberg@bnrllp.com>; Gabriella Petrillo <GPetrillo@mmwr.com>
Subject: Re: Cajilema v. Barrett Roofs, Inc. - Plaintiff's Initial Disclosures and Discovery Requests

External Email:

We asked you for a professional courtesy. You know you have an obligation to accommodate, right?

I feel like you think this back and forth is ok on these topics. It's not. This is not a motion.

We give courtesies. Period.

Joshua T. Reitzas, Partner
BERLANDI NUSSBAUM & REITZAS LLP
125 Park Avenue, 25th Floor
New York, New York 10017
(O) 212-804-6329
(C) 917-902-6582
jreitzas@bnrllp.com
www.bnrllp.com

Sent from my iPhone

On Oct 9, 2024, at 11:13 AM, Jeff Maguire <jmaguire@stevensonmarino.com> wrote:

Need confirmation in order to agree to extension of time.

Best Regards,

Jeff Maguire

Tel: (212) 939-7229
jmaguire@stevensonmarino.com
<image001.png>

From: jreitzas bnrllp.com <jreitzas@bnrllp.com>
Sent: Wednesday, October 9, 2024 11:10 AM
To: Jeff Maguire <jmaguire@stevensonmarino.com>
Cc: William Kennedy <WKennedy@mmwr.com>; trosenberg bnrllp.com <trosenberg@bnrllp.com>;
Gabriella Petrillo <GPetrillo@mmwr.com>
Subject: Re: Cajilema v. Barrett Roofs, Inc. - Plaintiff's Initial Disclosures and Discovery Requests

External Email:
Jeff,

We are trying to get the discovery done.

Joshua T. Reitzas, Partner
BERLANDI NUSSBAUM & REITZAS LLP
125 Park Avenue, 25th Floor
New York, New York 10017
(O) 212-804-6329
(C) 917-902-6582
jreitzas@bnrllp.com
www.bnrllp.com

Sent from my iPhone

On Oct 9, 2024, at 11:07 AM, Jeff Maguire <jmaguire@stevensonmarino.com> wrote:

Just to be clear, our consent is based on Defendants' consent that Plaintiff's responses are due within 30+22 days of Defendants' service. Please confirm this.

Best Regards,

Jeff Maguire

Tel: (212) 939-7229
jmaguire@stevensonmarino.com
<image002.png>

From: Kennedy, William <WKennedy@mmwr.com>
Sent: Wednesday, October 9, 2024 11:04 AM
To: Jeff Maguire <jmaguire@stevensonmarino.com>
Cc: jreitzas bnrlp.com <jreitzas@bnrlp.com>; trosenberg bnrlp.com <trosenberg@bnrlp.com>; Petrillo, Gabriella <GPetrillo@mmwr.com>; Kennedy, William <WKennedy@mmwr.com>
Subject: RE: Cajilema v. Barrett Roofs, Inc. - Plaintiff's Initial Disclosures and Discovery Requests

External Email:

We would provide the same courtesy for your discovery responses.

William Kennedy | Partner
Montgomery McCracken Walker & Rhoads LLP
<image004.png> 1735 Market Street | Philadelphia, PA 19103-7505
Tel: 215-772-7291 | Mobile: 215-990-2321 | Fax: 215-731-3689 | wkennedy@mmwr.com | [Attorney Profile](#)

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From: Jeff Maguire <jmaguire@stevensonmarino.com>
Sent: Wednesday, October 9, 2024 10:57 AM
To: Kennedy, William <WKennedy@mmwr.com>
Cc: jreitzas bnrlp.com <jreitzas@bnrlp.com>; trosenberg bnrlp.com <trosenberg@bnrlp.com>; Petrillo, Gabriella <GPetrillo@mmwr.com>
Subject: RE: Cajilema v. Barrett Roofs, Inc. - Plaintiff's Initial Disclosures and Discovery Requests

****CAUTION** External Email**

I can agree to that on the condition that Defendants agree that this additional time provided to Defendants is tacked onto the discovery response deadlines for Plaintiff.

Best Regards,

Jeff Maguire

Tel: (212) 939-7229

jmaguire@stevensonmarino.com

<image002.png>

From: Kennedy, William <WKennedy@mmwr.com>

Sent: Tuesday, October 8, 2024 12:03 PM

To: Jeff Maguire <jmaguire@stevensonmarino.com>

Cc: jreitzas bnrllp.com <jreitzas@bnrllp.com>; trosenberg bnrllp.com

<trosenberg@bnrllp.com>; Petrillo, Gabriella <GPetrillo@mmwr.com>

Subject: RE: Cajilema v. Barrett Roofs, Inc. - Plaintiff's Initial Disclosures and Discovery Requests

External Email:

Dear Jeff,

I believe our responses to Plaintiff's interrogatories and document requests are due on Thursday, October 10. We (Barrett Roofs and Mr. Delancey) are working on responses and gathering documents. Will you agree to extend the deadline for objections and responses until October 31?

We will serve our initial disclosures and initial discovery requests shortly.

Thanks for your cooperation.

Bill

William Kennedy | Partner
Montgomery McCracken Walker & Rhoads LLP
<image004.png> 1735 Market Street | Philadelphia, PA 19103-7505
Tel: 215-772-7291 | Mobile: 215-990-2321 | Fax: 215-731-3689 | wkennedy@mmwr.com | [Attorney Profile](#)

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From: Jeff Maguire <jmaguire@stevensonmarino.com>

Sent: Tuesday, September 10, 2024 7:45 PM

To: Kennedy, William <WKennedy@mmwr.com>

Subject: Cajilema v. Barrett Roofs, Inc. - Plaintiff's Initial Disclosures and Discovery Requests

****CAUTION** External Email**

Bill,

Please find attached Plaintiff's Rule 26 Initial Disclosures, First Set of Interrogatories to Defendant Delancey, and First Requests for Production of Documents to Defendants.

Best Regards,

Jeffrey R. Maguire, Esq., Partner
Stevenson Marino LLP
445 Hamilton Avenue, Suite 1500
White Plains, NY 10601
Tel: (212) 939-7229
Fax: (212) 531-6129
jmaguire@stevensonmarino.com

<image002.png>

<image005.png>

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